

1 HEATHER E. WILLIAMS, #122664
2 Federal Defender
3 RACHELLE BARBOUR, #185395
4 Assistant Federal Defender
5 OFFICE OF THE FEDERAL DEFENDER
6 801 I Street, 3rd Floor
7 Sacramento, CA 95814
8 Tel: 916-498-5700/Fax: 916-498-5710

9
10 Attorney for Defendant
11 XAVIER ROBERTS

12
13 IN THE UNITED STATES DISTRICT COURT
14 FOR THE EASTERN DISTRICT OF CALIFORNIA

15
16 UNITED STATES OF AMERICA,) Case No: 2:24-CR-0309-WBS
17 Plaintiff,)
18 vs.) STIPULATION AND ORDER TO CONTINUE
19 XAVIER ROBERTS,) STATUS CONFERENCE AND EXCLUDE
20 Defendant.) TIME
21) District Judge William B. Shubb
22) New Date: December 8, 2025
23) Time: 10:00 a.m.
24)
25)

26 IT IS HEREBY STIPULATED and requested by and between the parties through their
27 respective counsel, HEIKO COPPOLA, Assistant United States Attorney, attorney for the
28 UNITED STATES, and RACHELLE BARBOUR, attorney for Defendant XAVIER ROBERTS,
that the status conference currently set for Monday, October 27, 2025, be continued to Monday,
December 8, 2025, at 10:00 a.m., and that time be excluded for preparation of counsel.

29 The Government has provided hundreds of documents and dozens of video files for
30 Defense counsel's review in this case. Since the start of the case, Defense counsel has been
31 reviewing and analyzing the above, conducting legal research, meeting with her client, and
32 otherwise preparing for trial. The above tasks are ongoing, and the defense requires additional
33 time to review discovery, discuss the case with her client and the Government, conduct further
34 research in support of a plea resolution, and continue to prepare.

35 The parties expect to finalize a plea agreement in the additional time requested and
36 provide it to the Court for its review in anticipation of a change of plea at the next hearing. The

1 parties believe that failure to grant the requested continuance would deny defense counsel the
2 reasonable time necessary for effective preparation, taking into account the exercise of due
3 diligence. Mr. Roberts is out of custody in this matter in full compliance with all the terms of his
4 pretrial release.

5 Accordingly, the parties stipulate and request that the Court exclude time between the
6 date of the filing of this stipulation through the new status conference date of December 8, 2025,
7 under 18 U.S.C. § 3161(h)(7)(A), (B)(iv) (Local Code T4). The parties agree that the ends of
8 justice served by continuing the case as requested outweigh the interest of the public and the
9 defendant in a trial within the original date prescribed by the Speedy Trial Act.

10 Date: October 22, 2025

11 HEATHER E. WILLIAMS
12 Federal Defender

13 /s/ Rachelle Barbour _____
14 RACHELLE BARBOUR
15 Attorney for Defendant
XAVIER ROBERTS

16 Date: October 22, 2025

17 ERIC GRANT
18 United States Attorney

19 /s/ Heiko Coppola _____
20 HEIKO COPPOLA
21 Assistant U.S. Attorney
22 Attorney for the United States

23 O R D E R

24 The Court, having received and considered the parties' stipulation, and good cause
25 appearing therefrom, adopts the parties' stipulation in its entirety as its order.

26 Dated: October 22, 2025

27 
28 WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE